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FEDERAL COMMUNICATIONS COMMISSION
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OCT - 1 2003

Federal Communication Commission
Bureau / Office

In the Matter of)
)
 Amendment of Section 73.202(b)) MB Docket No. 03-144
 Table of Allotments)
 FM Broadcast Stations) RM Nos. 10733, 10788 & 10789
 (Breckenridge, Crawford, Eagle, Fort Morgan,)
 Greenwood Village, Gunnison, Loveland, Olathe,)
 Strasburg, Colorado and Laramie, Wyoming)

To Assistant Chief, Audio Division
 Media Bureau

OCT - 1 2003

Federal Communication Commission
Bureau / Office**REPLY COMMENTS**

Mayflower-Crawford Broadcasters, LLC ("MCB"), by its counsel, hereby submits its Reply Comments in response to the Commission's Public Notice dated September 16, 2003 (Report No. 2629) which designated MCB's Counterproposal (RM-10788) and the Petition for Rule Making (RM-10789) filed by Lenora Alexander and KAGM Joint Venture On-Air Family, LLC ("KAGM-JV") as counterproposals in the above-referenced docket. The docket was initiated by a Petition for Rule Making (RM-10733) filed by Dana Puopolo ("Puopolo"). The Commission must now consider which of the three rule making proposals is comparatively superior under the policies set forth in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982) ("*FM Allocation Policy*"). For the reasons set forth below, MCB submits that its proposal is superior and urges the Commission to adopt the changes to the FM Table of Allotments proposed therein.

THE MCB PROPOSAL

I MCB submitted a Counterproposal in this proceeding, proposing the deletion of Channel 272A at Gunnison, CO and the allotment of Channel 272C2 at Crawford, CO along

at /

with certain other changes that would be necessary to facilitate the Crawford allotment as that community's first local service. As set forth in MCB's Counterproposal, Crawford, Colorado is listed as a town in the 2000 U.S. Census and satisfies the Commission's definition of community for allotment purposes. Providing first local service to a community advances Priority 3 of the FM Allocation Policy.

THE PUOPOLO PROPOSAL

2. Puopolo, the initial petitioner in this docket, proposed amending the FM Table of Allotments by adding a Channel 293C3 to Gunnison, Colorado as that community's fourth FM service. Puopolo's proposal advances only Priority 4 of the FM Allocation Policy. Both the MCB and KAGM-JV counterproposals are superior to Puopolo's proposal because both of those proposals advance Priority 3 by proposing first local service.¹

THE KAGM-JV PROPOSAL

3. The linchpin of KAGM-JV's Petition is its plan to provide first local service to the community of Greenwood Village. To accomplish this, KAGM-JV proposes changing the community of license of KAGM-FM from Strasburg to Greenwood Village in accordance with the policies set forth in *Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 3870 (1989), *recon* *granted in part*, 5 FCC Rcd 7094 (1990) ("*Community of License Decision*"). A station may change community of license without being subject to competing applications if three criteria are met: (1) the proposed allotment is mutually exclusive with the current allotment; (2) the current

¹ In previously filed Reply Comments, Puopolo claimed that alternate channels could be allotted to Crawford that would allow both his proposal and MCB's proposal to be granted. However, Puopolo proposed alternate channels allotted only as Class C3 or Class A facilities at Crawford, not as the as Class C2 facility MCB proposed. Puopolo's alternative channels cannot be considered because MCB proposed a Class C2 facility for Crawford and is only interested in a Class C2 channel at Crawford in order to have a viable station.

community of license will not be deprived of its only local service; and (3) the proposed arrangement of allotments is preferred under the *FM Allocation Policy*.

4 MCB does not dispute KAGM-JV's assertion that its Petition satisfies the first two prongs of the *Community License Decision* test. However, MCB does not believe that KAGM-JV's Petition results in a preferred arrangement of allotments when compared with the proposal advanced in MCB's Counterproposal.

5 Greenwood Village is located within the Denver-Aurora Urbanized Area, approximately 12 km from Denver itself. This calls into question whether the proposed reallocation will be providing a first local service to Greenwood Village, or simply another local service to the already adequately served city of Denver, and an analysis under the criteria established in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) is required. The *Tuck* case established a three-prong test for community of license changes: (1) signal population coverage; (2) the size and proximity of the suburban community to the central city, and (3) the interdependence or independence of the suburban community to the central city of the urbanized area.

6 The 70 dBu contour of the proposed station at Greenwood Village will cover 32 percent of the Denver-Aurora Urbanized area. The 60 dBu contour appears to place a signal over the entire city of Denver and a much greater percentage of the Denver-Aurora Urbanized Area.² The population of Greenwood Village (11,035 according to the 2000 US Census) represents only 2 percent of the population of the 2000 US Census population of Denver (554,636). Also, all of the persons in the predicted net gain area appear to already receive at least five aural services, while there are persons within the resulting loss area that will be left

² See KAGM-JV Petition, Gain-Loss Area, Figure 3

with less than five aural services. While these first two *Tuck* prongs are not dispositive, they tend to favor a finding that a new service to Greenwood Village should be considered nothing more than an additional service to Denver. However, the third of the *Tuck* factors -- the demonstration of the proposed community's independence from the central city of the urbanized area -- is the most important

7 Based on its review of the eight factors³ examined to determine the independence or interdependence of a suburban community from the central city, KAGM-JV concludes that Greenwood Village is sufficiently independent from Denver to qualify for a first local service preference (Priority 3 under the *FM Allocation Policy*) MCB respectfully disagrees.

8 Regarding the first *Tuck* factor, KAGM-JV, citing the 2000 U.S. Census, states that 27% of the working population of Greenwood Village works in their place of residence. However, the city itself boasts that it has a "daytime population" of approximately 70,000. KAGM-JV Petition at p.5 Only about 1,500 of those workers are from Greenwood Village. The remainder must commute to Greenwood Village from other locations. With all of the available opportunity in the city of Greenwood Village, and only about 5,300 workers residing in Greenwood Village, the 27% figure should be much higher if the city is to claim independence from its surrounding urban area.

9. Although not much information is provided about the *Greenwood Villager*

³ The eight *Tuck* factors are (1) the extent to which the community residents work in the larger metropolitan area, rather than the specified community (2) whether the smaller community has its own newspaper or other media that covers the community's needs and interests, (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area, (4) whether the specified community has its own local government and elected officials, (5) whether the smaller community has its own local telephone book provided by the local telephone company or zip code, (6) whether the community has its own commercial establishments, health facilities, and transportation systems, (7) the extent to which the specified community and the central city are part of the same advertising market, and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools and libraries

newspaper. MCB concedes that KAGM-JV has, by showing the existence of a cable channel and a website in addition to the newspaper, demonstrated the existence of sufficient media outlets outside of Denver that serve the needs of the residents of Greenwood Village.

10 Community leaders may perceive themselves as separate from Denver, and Greenwood Village may have its own local government and commercial establishments (factors 3, 4 and 6), but there is significant evidence that shows how Greenwood Village and Denver are linked. For example, many businesses located in Greenwood Village use “Denver” in their names. See Exhibit A. The Denver Technological Center (“DTC”) is a huge commercial/residential development that straddles the City of Denver and Greenwood Village. See Exhibit B. Approximately 1,000 companies and 35,000 employees have offices within the 9,200,000 square feet of available office space. A special Town Center Zone was established within Greenwood Village to accommodate residential and commercial development for the DTC. While the DTC does not have a separate government, it claims to have protective covenants that transcend local jurisdictions. DTC land use control includes a Master Plan, Review Procedures and Design Criteria. See Exhibit B.

11 Greenwood Village would appear then to be subject to the development and land use decisions of the DTC Architectural Control Committee. Also, with 35,000 employees, it would seem that Greenwood Village’s commercial viability is dependent upon the continued growth and success of the DTC.

12 With respect to municipal services (factor 8) it should be noted that the nearest full service hospital is in Denver. A visit to the Cherry Creek School District website shows that none of the seven high schools, and only one of the seven middle schools in the district are located in Greenwood Village. Fire protection, library, water and sanitation services all appear

to be provided by non-Greenwood Village entities. See Exhibit C.

13 Based on this information, MCB submits that the *Tuck* factor analysis does not lead to a favorable finding of Greenwood Village's independence. Greenwood Village has not prevailed on a majority of the eight factors, though even if it had, the evidence on the first two prongs of the test (i.e., signal population coverage and the size and proximity of the suburban community to the central city) do not support a finding of independence.

CONCLUSION

14 The real contest here is between the MCB and KAGM-JV proposals, since the Puopolo proposal does not propose a first local service. For the KAGM-JV proposal to succeed, it must demonstrate that a first local service to Greenwood Village is not simply an additional service to the Denver metro area. KAGM-JV has failed to make a convincing showing that Greenwood Village is an independent community, free of the influence of the central urban city. Moreover, adopting the KAGM-JV proposal will create a loss area and persons within that loss area will be left with less than five available aural services.⁴


⁴ See KAGM-JV Technical Narrative

15 The MCB proposal, on the other hand, creates no loss area and provides a first local service to Crawford, Colorado, a *bona fide* independent community. For these reasons, the MCB counterproposal should be adopted in this docket. If its counterproposal is adopted, and an allotment is made to Crawford, MCB will file an application for the facility and, if the application is granted, construct the station

Respectfully submitted,

MAYFLOWER-CRAWFORD BROADCASTERS, LLC

By



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Washington, D.C. 20005
(202) 216-5798

Its Counsel

October 1, 2003

Exhibit A



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x

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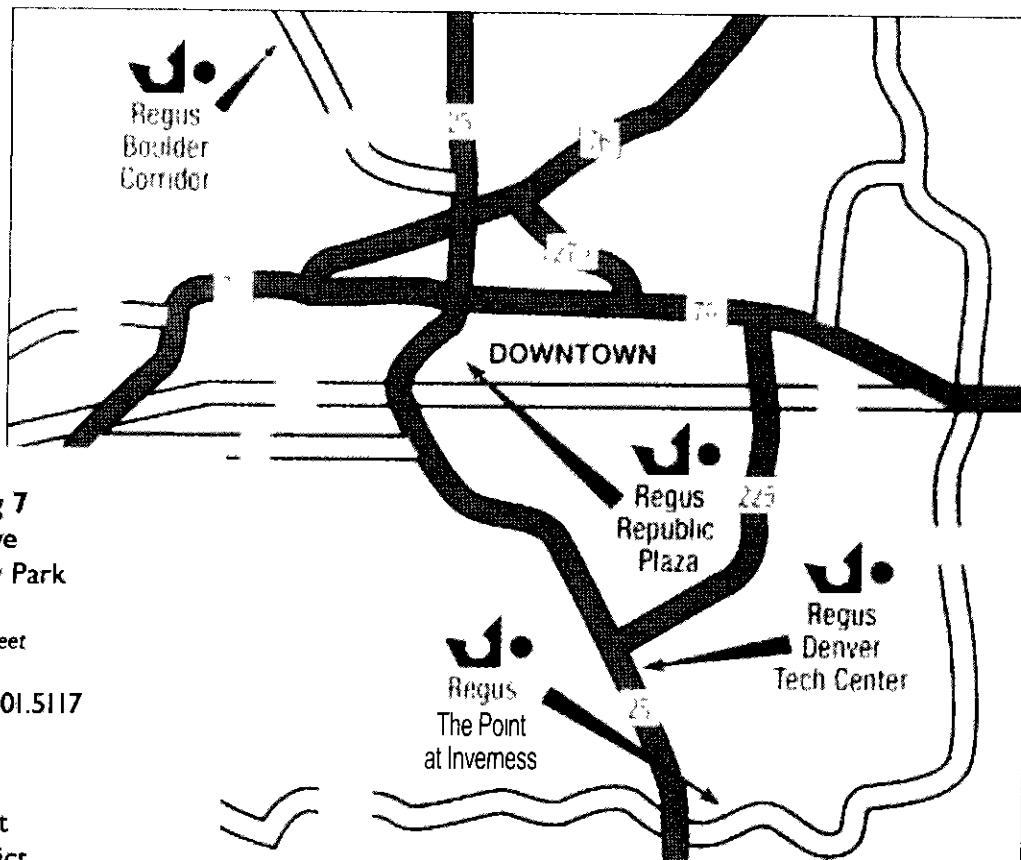
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Description

The Courtyard Denver Tech Center is conveniently located to the south of downtown Denver. The property is surrounded by parks, shopping centers, and restaurants. The property is a 5-minute drive from the airport and is a 10-minute drive from the downtown area. The property is a 10-minute drive from the airport and is a 10-minute drive from the downtown area. The property is a 10-minute drive from the airport and is a 10-minute drive from the downtown area.



Metropolitan
Denver Map



Boulder Corridor
Westmoor Building 7
10955 Westmoor Drive
Westmoor Technology Park
Westminster, CO
4th Floor – 52,911 Square Feet
1 – 458 workstations
Michelle Pruitt 303.601.5117

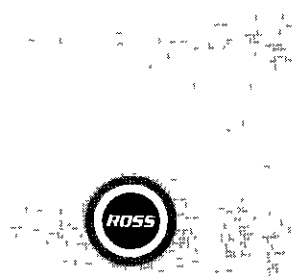
Downtown Denver
Republic Plaza
370 Seventeenth Street
Central Business District
Denver, CO
42nd and 43rd Floors – 49,368 Square Feet
1 – 335 workstations
Michelle Pruitt 303.601.5117

Denver Tech Center
Crescent VI
8400 E. Crescent Parkway
Denver Technological Center
Greenwood Village, CO
5th and 6th Floors – 37,000 Square Feet
1 – 270 workstations
Pete Bach 303.475.8960

Inverness Business Park
The Point at Inverness
8310 S. Valley Highway
Inverness Business Park
Englewood, CO
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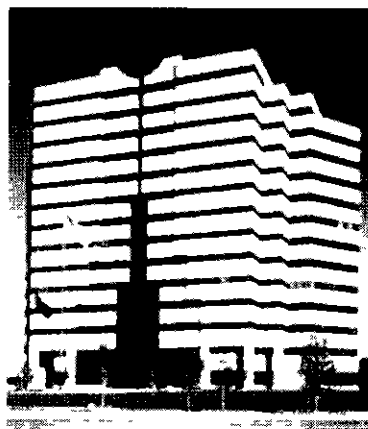
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Gordon, Hughes & Banks, LLP

Contact

5299 DTC Boulevard,
Suite 1000
Greenwood Village, Colorado 80111



directions

From Denver Take I-25 South to Belleview Avenue exit #199. Go East on Belleview Avenue approximately 65 miles to DTC Boulevard (NOT Parkway). Turn right at the light onto DTC Boulevard. Take a right at the second light onto Prentice Avenue. We are the building on the corner to your right called Prentice Point. Take your first right off Prentice Avenue into the driveway to the building. There is visitor parking inside the covered parking structure.

Denver Technological Center Office

5299 DTC Boulevard,
Suite 1000
Greenwood Village, Colorado 80111

Phone (303) 770-5700
Fax (303) 770-7581
Toll Free (877) 882-9856

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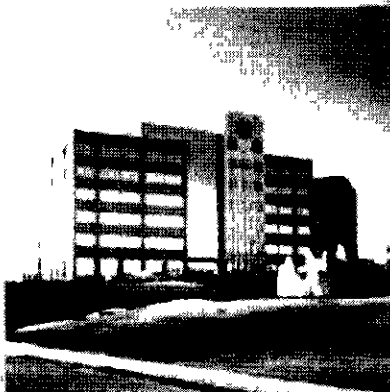
William J. Martinez III, CPA
Audit Senior



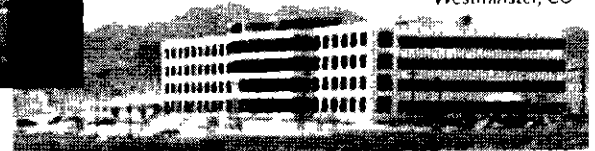
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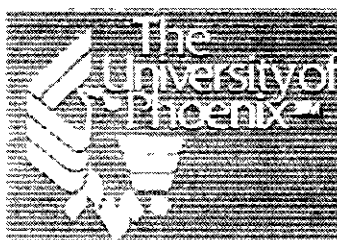
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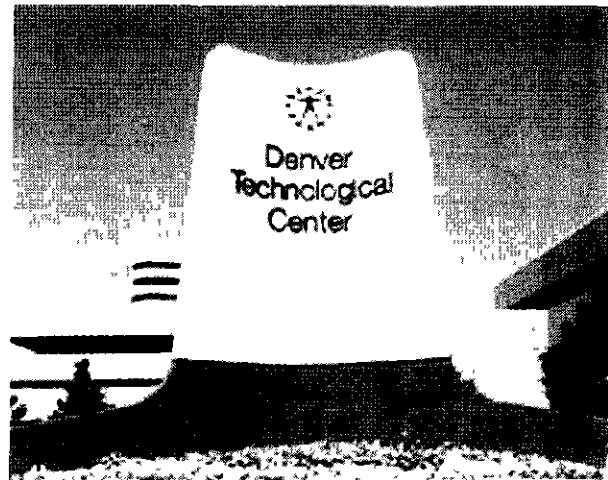
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Exhibit B

The Denver Technological Center (DTC) was established in 1962. The idea was simple: to establish a truly high-quality environment in which people could live and work. The concept matured over the years and the vision for a future urban environment has become a reality.



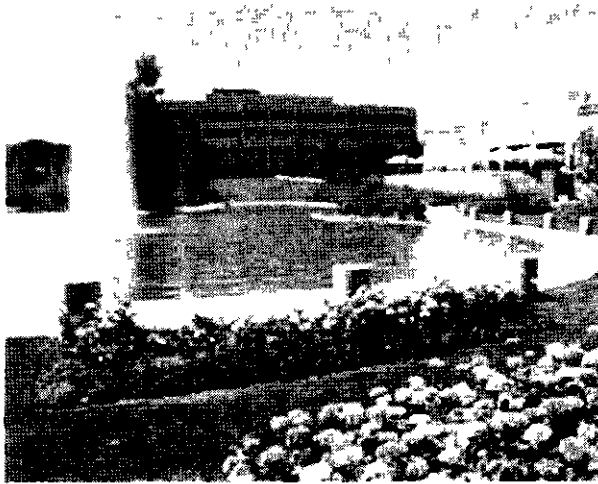
The DTC had an auspicious beginning. It was founded with only forty acres a few miles south of the City of Denver boundaries. Development of an office park was an unknown concept at that time. Acquisitions of land parcels accompanied slow, steady growth of the campus-like complex until the project reached 884 acres.

Nationally recognized as one of the country's premier business centers, the DTC is located at the junction of two major freeways, I-25 and I-225. The DTC forms the gateway to Denver's southeast business corridor. DTC is master planned to contain several times more than its current thirteen million square feet of development. Although most of the development in the Tech Center is comprised of office space, strategically located concentrations of hotels, residential apartments, condominiums, high-end single family residences, upscale retail, specialty shops, and restaurant complexes round out this mixed-use business center.

DTC began as a vision of a better environment for companies who wanted to locate closer to their new suburban residences. What has been created is a neighborhood environment of mixed-use development where businesses and people flourish.

The traffic system within the Center offers exceptionally good internal mobility. Parking is subdued, hidden under buildings, or by landscaped berms, to reduce the visibility of automobiles without sacrificing accessibility.

The low profile roads, parking and underground utilities allow the buildings, landscaping, plazas and people to be the focal points.



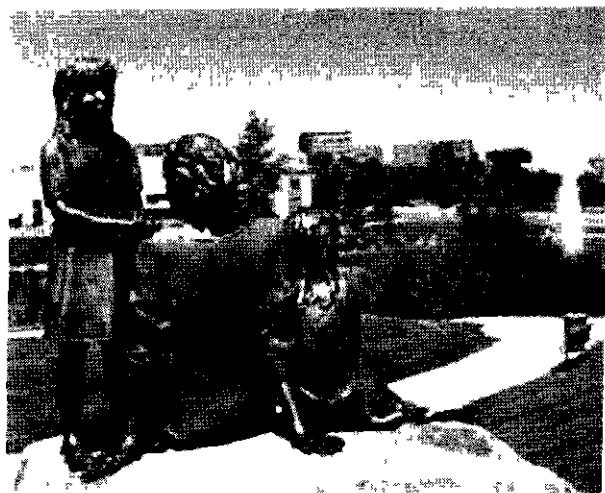
The master plan calls for a balanced mixture of land uses to create an urban center in a suburban setting. The tree-lined street system creates superblocks, which are developed with distinct visual characteristics. A sense of community has been enhanced by the addition of several high-quality apartment complexes.

At the heart of the Denver Technological Center is an innovative design concept, Crescent Town Center. The development has each building combining its open space to create common frontage on a curving road that borders a crescent shaped park. Crescent Town Center has established a focal point and significant amenity with a hotel, bank, restaurants and public park for the DTC.

Master plan development and management have created the foundation for a suburban "edge city." Planning controls are the cornerstone of DTC's environment. The Architectural Control Committee ensures that the highest standards are maintained in existing product and in all future development projects. Protective covenants provide development guidelines to enhance land values for present owners, future investors, tenants and residents in the DTC.

DTC has created an environment that allows corporations, investors, tenants and employees to find all the required amenities that will serve their many needs. These include a prime location, good access, infrastructure elements and planning controls. Every feasible aspect involving quality development is available at DTC. As developers of the business park that has achieved national recognition, it is our long-range plan to continue this proven heritage.

The following highlights illustrate the DTC:



1. Approximately 1,000 companies reside in the DTC with heavy orientation on technological operations including media, communications, financial services, sales, engineering, professional firms as well as various corporate operations.
2. There are approximately 35,000 employees working at the DTC. This represents the largest employment center in the Southeast Corridor.
3. Over thirteen million square feet have been developed, including 9.2 million square feet of office space. Also located within the DTC are 1,903 apartment and 126 single family units, Belleview Promenade (upscale retail), a 650-room Marriott hotel, a 450-room Hyatt Regency, and a 120-room AmeriSuites. Sites for three more hotels are incorporated in the long-range plans, giving DTC the best location for high quality accommodations.
4. Location is a key feature to the business park. DTC's location at the junction of I-25 and I-225 allows convenient access to all parts of metropolitan Denver. The approximate 15-minute drive to downtown Denver, 30 minutes to Denver International Airport and 10 minutes to Centennial Airport, make the DTC accessible to over 60% of Denver's labor force.
5. Public transportation is increasing on a regular basis. There are 375 regular and express bus trips serving the DTC each day of the work week. Most buses serving the Southeast Corridor originate and/or terminate in downtown Denver and make stops at various transfer stations in DTC. Additional ground transportation to downtown and the airport is provided by shuttle and limousine services.
6. Most of Denver's prime residential areas, attracting executive and management personnel, are within five minutes of DTC.

One of the concepts making development plans a reality at DTC is the Superblock. Each Superblock contains 30 acres or more, equivalent to 16-20 city blocks. Each parcel development is required to have a minimum of 30% open space. Combining common open space with required open space in each Superblock, DTC is assured of always having in excess of 40% open space, creating places for people to gather and recreate.

DTC lies within two governmental jurisdictions, the City of Denver and the City of Greenwood Village. DTC thereby has flexibility and choice to select the municipality in which to develop or operate.

B-8 zoning in Denver allows an intense commercial use that encourages high-rise development. A special Town Center Zone was established in Greenwood Village to accommodate a mixture of density development and building heights.

A major road network is in place, including access to the two major freeways at four interchanges. Underground power, telephone, water, gas and sewer systems are in place throughout DTC.

Excellent electrical service at DTC is one of the Center's outstanding features. There are three separate power substations serving the area, making it the ideal location for a number of major computer companies.



The Denver Technological Center has often been described as one of the finest business parks in North America. The aesthetic and fiscal value of the properties has out-paced other area Parks and submarkets including the central business district in Denver for many years. This quality is maintained through the implementation of protective covenants, which include strict architectural controls. These covenants establish a high set of standards for planning and design, which are fair to all parties, while maintaining exceptional value for each property within the Denver Technological Center.

The Protective Covenants of Denver Technological Center legally apply to all land that is part of DTC, regardless of ownership and they are independent of the zoning and land use regulations of local governments.

The system of land use control created by the Covenants includes a Master Plan, Review Procedures and Design Criteria.

Accessibility to Denver Technological Center is excellent because of the confluence of I-25 and I-225, which bounds the park on the north. I-25 provides major north-south accessibility connecting into Downtown Denver and Denver International Airport via either I-70 or I-225.

Three major interchanges provide access to the DTC from I-25. Bellevue Avenue and Orchard Avenue provide direct arterial access and Arapahoe Road, south of the park provides access via the Yosemite Street Overpass. The Yosemite Street interchange off of I-225 provides a frontage road to DTC Boulevard, which is the major north/south boundary road in DTC. These interchanges were designed with sufficient capacity to accommodate all planned development within DTC.

DTC comprehensive internal street network connects with five major arterials, and with traffic flow within DTC controlled by signalized intersections at key locations. Internal streets within DTC consist of broad parkways with landscaped medians, which provide for access to all parcels within the park. These parkways bring automobiles directly to parking lots designed to serve individual buildings. Median cuts are planned at predetermined access points. These points are referred to in the Accessibility Masterplan.

DTC encourages the use of measures to reduce reliance on single occupancy of vehicles through both a rideshare program (which allocates 5% of total parking as preferential parking for its users) and an extensive bus system. A major timed transfer bus stop (pulse point) of the Regional Transportation District (RTD) is located in northern DTC. Express route bus services is available via I-25 and Arapahoe Road. The regional, local and internal service is outstanding, with several bus shelters and stops throughout. Employees have a fairly direct connection to DTC from all areas of Metropolitan Denver on over-the-road buses allowing commuters to work while riding.

An internal shuttle bus service system was initiated by the Southeast Transportation Authority (SETA) in 1999. This system supplements RTD service within the area of I-225 to Arapahoe Road between Yosemite Street on the east and Monaco Street on the west. Service headways are 5 minutes peak, and 15 minutes off peak.

Electricity is provided through Xcel Energy of Colorado. The existing underground distribution system within DTC has among the highest degree of reliability in terms of existing and backup facilities on the entire Xcel system in the state of Colorado. The system is also readily expandable to meet future needs.

Power supply is derived from a 230-Kilovolt transmission network which transverses the northwest portion of DTC with strong ties to the Xcel transmission grid system. The southern portion of DTC is supplied with 100-megawatt capability and is used as an alternative power source for reliability purposes to major computer facilities.

Natural gas services are available through Xcel Energy. DTC is supplied via a 20-inch high pressure main, which is considered capable of meeting any service demands with the Development.

Individual sites are serviced by a series of smaller lines ranging in size from 1.2 inches to 6 inches and are typically adjacent to available parcels. Xcel is capable of providing up to 20,000 cubic feet per hour per customer at operating pressures of .25 to 2.00 Psig. Normal content is 829 BTU per cubic foot based on Denver Metropolitan elevation.

Telephone service within DTC is available through Qwest Communications and several alternative access providers. Voice grade service, provided over a network of copper wire and fiber optics conduit, is available within the system. Adequate capability either exists today or can be readily provided through this system to accommodate loading demands.

Service extensions to and within individual sites in DTC are typically made under construction allowances established under service contracts and are usually predicated upon service load demands. Extending service to a new site falls under A4 Tariffs on file with the Public Utilities Commission. For normal types of services, such extensions are at no cost to the user.

Cable television is provided by AT&T Broadband. AT&T provides fiber optic cable line for cable television and interactive video, data and voice services. They also offer Digital Music Express (DMX) - CD quality music delivered 24 hours a day. This service is uninterrupted and subscriber controlled. All of the services are available via cable and many may be obtained via Direct Broadcast Satellite.

Fire protection services south of Belleview Avenue are provided by the South Metro Fire Rescue, which has full service stations located at East Orchard Road and South Havana Street, East Orchard Road and South Quebec Street and South Monaco Parkway and Hampden Avenue. The water flow for fire fighting in DTC is greater than 1500 gpm for an indefinite number of hours. Properties within DTC carry an I.S.O. fire rating of 3. All districts utilize the 1991 Uniform Fire Code for building and site plan referrals.

Water is supplied to DTC by the Denver Water Department and is distributed throughout the Center by three entities ~ Denver Suburban Water District, Castlewood Water District and Southgate Water District. In most cases the trunk system is already installed adjacent to the development parcels. On-site looping and fire services are typically the responsibility of the individual site developer. Water pressure throughout DTC generally has a pressure range of 90 p.s.i. to 120 p.s.i.



Tap fees are paid to individual Districts as well as to the Denver Water Board. Design standards for both entities must be met. The Denver Water Board tap fee is paid

separately from the supplying entity. However, District tap fees must be paid before application to Denver for a tap.

Sanitation service is provided by Denver Wastewater Management Division in the northern portion of DTC while Goldsmith Gulch Sanitation District and Southgate Water and Sanitation District are responsible for the southern portions. Each District requires tap fees.

Irrigation of medians and parks within DTC is provided from district wells with non-potable water. Site irrigation is generally the responsibility of individual developers through the potable system. In some instances in the southern portion of DTC, Goldsmith Metropolitan District will consider use of its well system for on-site irrigation.

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[DTC Architectural Control Committee](#)[Statement of Purpose](#)[Protective Covenants](#)[Applicable Documents](#)[Architectural Control Committee](#)[Activities Necessitating Review](#)[Meeting Schedule and Location](#)[Committee Membership](#)[Contact](#)[Other Review Agencies](#)[Denver](#)[Greenwood Village](#)[Service Districts](#)

The Denver Technological Center has often been described as the finest business park in North America. The aesthetic and fiscal value of the properties has outpaced other area sub markets including the central business district in Denver for many years. This quality is maintained through the implementation of protective covenants, which include strict architectural controls. These covenants establish a high set of standards for planning and design, which are fair to all parties, while maintaining exceptional value for each property within the Denver Technological Center.

The Protective Covenants of Denver Technological Center legally apply to all land that is part of DTC, regardless of ownership and are independent of the zoning and land use regulations of local governments.

The system of land use control created by the Covenants includes not only the Covenants but also a Master Plan, Review Procedures, and Design Criteria. These

documents are available through the Architectural Control Committee offices or can be [downloaded on this web site](#).

The Covenants and supporting documents are administered and enforced by an Architectural Control Committee ("ACC"). A current listing of members can be found below

Under the Covenants, any proposals to construct, modify or demolish improvements within DTC must obtain plan approval from the ACC prior to commencement. The ACC's review and approval process also applies to signage, changes in property use, and maintenance activities that take place on or with respect to property that is part of DTC. The ACC meets on a regular basis to review plan submittals. After the ACC approves a plan submittal, an applicant may proceed with a project, but only in strict compliance with the terms and conditions of approval. The ACC performs periodic site inspections, both during development and on an ongoing basis thereafter to ensure compliance.

The ACC meets monthly at the DTC Executive Offices. Projects are placed on the meeting agenda after applications are made at Staff level meetings at least two weeks prior to a meeting

The Architectural Control Committee is made up of six (6) regular members. Of these six, at least two members must be Architects and one member must be currently engaged in land planning practice. All other members must have a minimum of ten (10) years of experience in land planning or development. Membership is as follows:

Mr. Raymond A. Bullock, P.E., Chairman

Vice President, Denver Technological Center; Mr. Bullock has over 30 years of

experience in Civil Engineering, Community Planning, and Land Development activities.

Mr. Brent Miller, Voting Member

Mr. Miller has served as Chief Development Officer of SHLP and in that role has been involved in the development and construction of over 12,000 multifamily residential units throughout the United States. His background includes all facets of development from urban planning and architectural design to construction management of a wide variety of housing types.

Mr. Mark W. Johnson, A.S.L.A., A.P.A., Voting Member

Mr. Johnson has been practicing Urban Design and Landscape Architecture for 20 years. He has taught and lectured at several universities, and has led the design efforts for major public and private projects throughout the western United States. As a founding principal of Civitas, Inc., he has won local and national awards for state-of-the-art planning and design projects at many scales.

Mr. John M. Prosser, Voting Member

Professor of Architecture and Urban Design at the University of Colorado, as well as a practicing Architect, Urban Designer and Planner since 1969. Mr. Prosser serves on numerous review boards and committees including the Community Development Council of the Urban Land Institute.

Ms. Laurel S. Raines, A.S.L.A., Voting Member

Ms. Raines is a Landscape Architect and Principal with EDAW-HRV, an international landscape architecture and planning firm. Ms. Raines was formerly a founding partner of the Office of Hyatt, Raines & Vitek. She has produced award-winning design work throughout the southwestern United States and taught site design at the University of Colorado's School of Environmental Design.

Mr. Jerome M. Seracuse, F.A.I.A., Voting Member

Practicing Architect and Planner with over 30 years of experience. During his practice, he designed numerous noteworthy architectural and planning projects including major public and private projects.

ACC Staff

Ms. Donna R. Ries, Staff Coordinator
John F. Forhan, Esq., Legal Counsel

Architectural Control Committee

8350 East Crescent Parkway, Suite 100,
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Phone (303) 773-1700
Fax (303) 694-6316
[Click Here to E-Mail](#)

City & County Building: 720-913-4900

Website Home Page: <http://www.denvergov.org/>

Planning & Zoning: 303-640-2191

Zoning Administration: 200 W. 14th Ave.; Rm. 201, Denver, CO 80204

http://www.denvergov.org/Zoning_Permits/

Building - Permit Center: 720-865-2915

200 W. 14th Avenue; Denver, CO 80204

http://www.denvergov.org/Building_and_Construction/

Engineering: 720-913-4500

200 West 14th Avenue, Room 303, Denver, Colorado 80204

http://www.denvergov.org/City_Engineering/

Fire: 720-913-3473

Denver Fire Department; 745 West Colfax Avenue; Denver, CO 80204

<http://www.denvergov.org/firedepartment/>

Wastewater Control: 303-446-3725

2000 West 3rd Avenue Denver, Colorado 80223

<http://www.denvergov.org/WasteWater/>

Greenwood Village City Hall: Telephone 303-773-0252; Fax 303-290-0631

6060 South Quebec Street; Greenwood Village, CO 80111

Website Home Page: <http://www.greenwoodvillage.com/>

Planning & Zoning: 303-486-5783

<http://www.greenwoodvillage.com/commissions/pzmembers.html/>

Building: 303-486-5783

<http://www.greenwoodvillage.com/community/permits.html/>

Engineering: 303-708-6138

<http://www.greenwoodvillage.com/publicworks/engine.html/>

Castlewood Water District: 303-770-7272

7901 E. Belleview Ave., Suite 230; Englewood, CO 80111

Castlewood Sanitation District: 303-770-7272

7901 E. Belleview Ave., Suite 230; Englewood, CO 80111

Southgate Water & Sanitation District: 303-779-0261

3722 E. Orchard Rd.; Littleton, CO 80121

Denver Suburban Water District: 303-779-4550

8350 E. Crescent Parkway; Greenwood Village, CO 80111

South Metro Fire District: 303-773-8282

7900 E. Berry Pl.; Englewood, CO 80111

<http://www.southmetro.org/>

Goldsmith Metropolitan District: 303-779-4550

8350 E. Crescent Parkway; Greenwood Village, CO 80111

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Exhibit C

SPOTLIGHT ON GV BUSINESSES



Greenwood Village Chamber Of Commerce News

Vibrant, progressive, diverse, and focused on supporting the Village community, the Greenwood Village Chamber of Commerce is the voice for businesses in Greenwood Village, including Greenwood Plaza, the Denver Technological Center, and surrounding areas. Through the implementation of programs and networking events, the Greenwood Village Chamber of Commerce is focused on building a sense of business community, improving economic growth in the Village, and supporting and promoting Village businesses.

Greenwood Village Chamber of Commerce:

5600 South Quebec Street Suite 265C, Greenwood Village, CO 80111
Phone: 303-290-9922 • Fax: 303-290-9934 • Web Site: www.gvcchamber.com

STRICTLY BUSINESS

Q: How do my property taxes in Greenwood Village compare to other cities?

A: Greenwood Village has one of the lowest mill levy rates in the Denver Metro area and the lowest mill levy rate for cities and towns within Arapahoe County. The Village's current mill levy rate of 2.932 equates to approximately \$28.56 of property tax per \$100,000 of assessed market value of a home. The Village's portion of a typical residential property tax statement is less than four percent of the total amount.

Individual property tax statements will vary depending upon the districts where a property is located. Below is a breakdown of a Village residential property tax statement based upon a \$400,000 home:

TAXING ENTITY	TAX LEVY	AMOUNT
Cherry Creek School District 5	47.331	\$1,843.94
Arapahoe County	14.594	\$ 568.56
City of Greenwood Village	2.932	\$ 114.23
Arapahoe Library District	3.695	\$ 143.95
South Metro Fire Rescue District	6.500	\$ 253.23
Castlewood Sanitation District	0.275	\$ 10.71
Castlewood Water District	0.525	\$ 20.45
Cherry Creek Basin Authority	0.362	\$ 14.10
Urban Drainage & Flood Control District	0.602	\$ 23.45
Totals	76.820	\$2,992.62

Greenwood Village property tax revenues represent only six percent of the total revenues received by the Village. Residential property tax revenues collected by the Village are designated for services including residential trash service. There may be other special taxes not listed, depending on where you live in the Village.

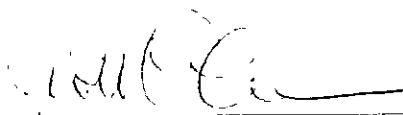
For more information regarding property taxes, please contact Craig Larson, Director of Finance at 303-486-8290 or the Arapahoe County Treasurer's Office at 303-795-4550.

Attention Village businesses! What would you like to know? Send your questions to Strictly Business, Attention Gita Listiadji, 6060 South Quebec Street, Greenwood Village, CO 80111-4591 or fax to 303-486-5757. You may also call the Village Tax Line to speak to a member of the Village Tax Staff at 303-486-8299.

CERTIFICATE OF SERVICE

I, Scott C Cinnamon, do certify that I have caused to be mailed by first class mail, postage prepaid, copies of the foregoing "^{1.11.11 Cinnamon}Counterproposal" to the following.

- * Rolanda F. Smith
Audio Division
Federal Communications Commission
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- Dana J Puopolo
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Scott C. Cinnamon

*- by hand